

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



TONDEE CLINCY AND OTHERS
SIMILARLY SITUATED

PLAINTIFF

VERSUS

CAUSE NO. 3:20CV 4 HTW-LRA

HINDS COUNTY SCHOOL DISTRICT

DEFENDANTS

NOTICE OF REMOVAL

COMES NOW Defendant Hinds County School District, by and through counsel and pursuant to 28 U.S.C. §§ 1331 and 1441 and hereby removes this cause to this Court and in support thereof would show as follows:

1. A copy of the Complaint is attached as **Exhibit "A."**

Federal Question Jurisdiction

2. Removal is appropriate pursuant to 28 U.S.C. §1441 because Plaintiff has initiated a civil action over which this Court has original jurisdiction. Consequently, this Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and 1441.

3. Venue is proper in this district and division under 28 U.S.C. § 1441(a) because this action was originally filed in Hinds County, Mississippi, which is located in the Northern Division.

4. A copy of the Complaint served on Defendant is attached hereto as **Exhibit "A"** and is incorporated herein by reference. A certified copy of the entire state court record will be filed as soon as received pursuant to L.U.Civ.R. 5(b).

5. Defendant, after promptly filing this Notice of Removal, will give notice to all adverse parties and is further e-filing a Notice of Removal to the Circuit Clerk of Hinds County, Mississippi with a copy of this removal attached.

6. Defendant further reserves the right to amend and/or supplement this Notice of Removal.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that this Court assume jurisdiction over the cause herein as provided by law.

RESPECTFULLY SUBMITTED this the 3rd day of January, 2020.

HINDS COUNTY SCHOOL DISTRICT

/s/ Elizabeth Lee Maron
One of Its Attorneys



OF COUNSEL:

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CERTIFICATE OF SERVICE

I do hereby certify that I have this 3rd day of January, 2020 filed a Notice of Removal in the United States District Court with the Clerk of the Court. As this Notice of Removal is the first filing, this pleading has been hand delivered to the federal court clerk for filing. It has also been emailed and mailed to counsel below at the contact information listed below.

Joel F. Dillard
775 N. Congress Street
Jackson, MS 39202
Email: joel@joeldillard.com

A copy of this Notice of Removal was attached to the Notice of Removal to the United States District Court e-filed in the Hinds County Circuit Court.

Zack Wallace, Circuit Clerk
P. O. Box 327
Jackson, MS 39205

/s/Elizabeth Lee Maron
Attorney for the Defendant